Ronald J. Wronko (RW1859) RONALD J. WRONKO, LLC 134 Columbia Turnpike Florham Park, New Jersey 07932 (973) 360-1001 Attorneys for defendant Shaw Creations, Inc.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EVERGLORY COMPANY,

Plaintiff,

v.

SHAW CREATIONS, INC.,

Defendant.

SUNNY COMPANY,

Plaintiff,

v.

SHAW CREATIONS, INC.,

Defendant.

TO: Bernard D'Orazio, Esq. Law Offices of Bernard D'Orazio, P.C. 100 Lafayette Street, Suite 601 New York, New York 10013-4400 Counsel for Defendant

> Ronald Rankin, President **Defendant Shaw Creations**

Civil Action No. 07 Civ. 9361 Civil Action No. 07 Civ. 9360

**CIVIL ACTION** 

NOTICE OF MOTION OF DEFENDANT'S COUNSEL, RONALD J. WRONKO, LLC, TO

WITHDRAW AS COUNSEL FOR

DEFENDANT SHAW CREATIONS, INC.

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65 Clyde Road Somerset, New Jersey

**COUNSEL:** 

PLEASE TAKE NOTICE that on July \_\_\_\_\_, 2008, or as soon thereafter as

counsel may be heard, counsel for defendant Shaw Creations, shall move before the

United States District Court Southern District of New York, for an order permitting

counsel to withdraw from its representation of defendant;

PLEASE TAKE FURTHER NOTICE that the defendant shall rely upon the

Affidavit of Ronald J. Wronko, Memorandum of Law, and proposed form of Order

submitted herewith;

PLEASE TAKE FURTHER NOTICE THAT the defendant requests oral

argument if the motion is opposed.

PLEASE TAKE FURTHER NOTICE THAT a trial or arbitration date has not yet

been assigned.

Respectfully Submitted,

RONALD J. WRONKO, LLC

Attorneys for defendant

\_/s/ Ronald J. Wronko\_\_

Ronald J. Wronko

Dated: July 7, 2008

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